

April 29, 2018

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Tiffany Samantha Lee Perez *Principal*

United States

Case Number:

YOB: 1990

M-18- 0926 -M

Eliodoro Enriquez-Hernandez *Co-Principal*

Mexico

YOB: 1962

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 4/28/2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Elias Carreto-Chitic, citizen of Guatemala, and John Paul Jimenez-Pauta, citizen of Ecuador, along with thirty-three (33) other undocumented aliens, for a total of thirty-five (35), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, To Wit; at a residence located in Penitas, Texas

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii)
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On April 28, 2018, Border Patrol Agents received information regarding a blue GMC Yukon XL being used to transport undocumented aliens. Agents conducted record checks on the vehicle which returned to registered owner as Tiffany Perez with an address of 17917 Queen Palm Drive in Penitas, Texas.

Later that day, agents proceeded to 17917 Queen Palm Drive in Penitas, Texas, located the blue Yukon and conducted surveillance. During surveillance agents observed a tan Kia crossover depart the location. At that time agents contacted the Texas Department of Public Safety (TXDPS) to assist in the investigation.

I declare under penalty of perjury that the statements in this complaint are true and correct. Executed on April 29, 2018.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

Sworn to before me and subscribed in my presence,

04/29/2018
Date

J Scott Hacker, U. S. Magistrate Judge
Name and Title of Judicial Officer

Signature of Complainant

/S/ David Bernal III Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas
City and State

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-0926-M

**RE: Tiffany Samantha Lee Perez
 Eliodoro Enriquez-Hernandez**

CONTINUATION:

A TXDPS Trooper conducted a traffic stop on the tan Kia for Fail to Signal Required Distance before Turning and Display Wrong License Plate near the intersection of Farm-to-Market 2221 and Queen Palm Drive in Penitas, Texas.

At that time, agents approached the occupants of the tan Kia and conducted an immigration inspection. The driver was identified as Tiffany Samantha Lee Perez, a citizen of the United States. The front passenger was identified as Eliodoro Enriquez-Hernandez, legal permanent resident. The back passenger was identified as John Paul Jimenez-Pauta and was determined to be illegally present in the United States.

At the vehicle stop Perez and Enriquez were read their Miranda rights and agreed to answer questions. Perez was questioned as to her involvement in alien smuggling. Perez stated she had more undocumented aliens at her house, 17917 Queen Palm Drive in Penitas, Texas, and gave verbal and written consent to search the residence.

Border Patrol Agents proceeded to the residence and encountered thirty-four subjects. All thirty-four subjects were determined to be illegally present in the United States.

Perez, Enriquez, and the thirty-five undocumented aliens were arrested and transported to the Border Patrol station.

PRINCIPAL STATEMENT 1:

Tiffany Samantha Lee Perez, was read her Miranda Rights. She understood her rights and provided a sworn statement.

Perez stated she was arrested because she had undocumented aliens at her house. Perez stated she has harbored undocumented aliens at her residence for approximately two months and would get paid \$100 USD per person. Perez stated a subject known as Eliodoro, lived at her residence and harbored approximately nine subjects in his room. Perez further indicated Eliodoro received money from human smuggling proceeds.

Perez, identified Eliodoro Enriquez, through a photo lineup, as the subject who lived with her and harbored undocumented aliens in his room.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18- 0926 -M

**RE: Tiffany Samantha Lee Perez
Eliodoro Enriquez-Hernandez**

CONTINUATION:

PRINCIPAL STATEMENT 2:

Eliodoro Enriquez-Hernandez, a citizen of Mexico, was read his Miranda Rights. He understood his rights and provided a sworn statement.

Enriquez stated he was arrested because several undocumented aliens were found in his house. Enriquez stated a subject known as Tiffany would transport undocumented aliens to the house. Enriquez stated he would withdraw money from financial institutions for Tiffany, in exchange he would get 10 percent of the money.

MATERIAL WITNESSES STATEMENTS:

Elias Carreto-Chitic and John Paul Jimenez-Pauta were read their Miranda Rights. Carreto and Jimenez both agreed to provide a sworn statement without the presence of an attorney.

Material Witness 1:

Carreto, a citizen of Guatemala, stated he illegally entered the United States by rafting across the river. Once in the United States, Carreto stated he and twelve others, were eventually transported to the stash house where he was arrested. Carreto stated a female subject driving a blue SUV transported them to the stash house. Carreto further stated the same female was also arrested with him. Carreto stated that when he arrived to the stash house the female subject instructed them to take their clothes off and shower. Carreto identified Perez, through a photo lineup, as the person who gave him instructions and transported him to the stash house.

Carreto stated that when Perez was not at the stash house a male subject was in charge. Carreto stated the subject looked out for law enforcement, instructed them to be quiet and stay in the bedrooms. Carreto identified Enriquez, through a photo lineup, as one of the people in charge at the stash house.

Material Witness 2:

Jimenez, a citizen of Ecuador, stated his mother made his smuggling arrangements and was to pay \$14,000 (USD). Jimenez stated he illegally entered the United States with thirteen other subjects. Once in the United States, Jimenez stated he and five others, were eventually transported to a house by a female driving a blue SUV. Jimenez stated that while at the house, the same female was in charge, and would make the undocumented aliens use her cellphone to make payment arrangements. Jimenez stated the female subject would not let any of the undocumented aliens leave the house or look out the windows. Jimenez identified Perez, through a photo lineup, as the female subject who gave him instructions and transported him to the stash house.

Jimenez identified Enriquez, through a photo lineup as a person who might be working with Perez.